

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Magnetation LLC
64 East 100 North
Reynolds, Indiana 47980**

ATTENTION:

**Terry Nanti
General Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Magnetation LLC (Magnetation or you) to submit certain information about the facility at 64 East 100 North, Reynolds, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Magnetation owns and operates an emission source at the Reynolds, Indiana facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan and applicable Clean Air Act regulations.

Magnetation must send all required information to smith.molly@epa.gov and:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Magnetation must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

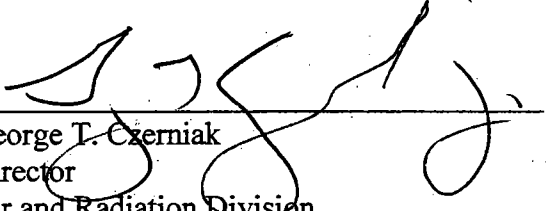
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Magnetation to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Molly Smith at (312) 353-8773 or smith.molly@epa.gov.

Date

12/11/15


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel format, and not in image

format. If Excel formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Magnetation LLC (Magnetation or you) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) for the emission source at 64 East 100 North, Reynolds, Indiana (the facility). Magnetation must submit Items 1-4 within 14 calendar days from the receipt of this Request, and Items 5-18 within 45 days from receipt of this Request, and Item 19 within 60 days from receipt of this Request.

1. Provide copies of each stack test conducted on any emissions unit for any reason, and all test runs, even if a full test series was not completed, since the date of start-up. Identify the emissions unit, specify the date of the test, test method used, and the filter temperature during the time of the test, if applicable. Provide all calculations relative to the stack test, and provide copies of the full test report, including the section describing the process parameters and production or processing rates at the time of the test. Also include copies of any reports of visible emission observations conducted during each test. For each test during which the source was not operating at maximum design capacity, provide an explanation why production was limited. For each test also identify if the preheat burners were in operation.
2. Provide copies of all permit annual compliance certifications, semi-annual compliance certifications, and deviation reports submitted to the Indiana Department of Environmental Management (IDEM) from the start-up date to present.
3. From the date of start-up to present, provide the hours of operation for each month in electronic format (Excel spreadsheet) separately for each process unit and associated air pollution control device (i.e., baghouse or gas suspension absorber). Provide the start and end date and time and description for why a process unit was operated without the associated air pollution control device. Also provide any notifications submitted to IDEM.
4. Provide an explanation of why the following units are not subject to 40 CFR Part 60, Subpart OOO:
 - a. one load hopper, EU025a;
 - b. one enclosed vibrating grizzly feeder/screener, EU025a; and
 - c. one covered belt feeder, EU025a.
5. Provide copies of all current permits to construct and permits to operate issued by IDEM. For each permit:
 - a. provide the original permit application including all appendices, attachments, and revised permit applications;

- b. provide copies of the emissions calculations submitted in conjunction with all permits to construct and permits to operate in electronic format (Excel spreadsheet); and
 - c. state whether the projects allowed by each permit issued were completed as described in the applications for each of the permits. If the project was completed in a different manner, provide a description of how it was changed.
- 6. For any stack testing done for compliance purposes that was conducted outside of the required timeframe set forth in the facility's permit, describe the justification for the delayed testing schedule and provide any correspondence with IDEM.
- 7. From the date of start-up to present, provide the monthly hours of operation for the main indurating furnace burners and the pre-heater burners.
- 8. From the date of start-up to present, provide the usage in tons, unless otherwise stated, for each month of the following materials in an electronic format (Excel spreadsheet):
 - a. Natural gas in MMBtu;
 - b. Iron concentrate;
 - c. Limestone;
 - d. Dolomite;
 - e. Coke breeze;
 - f. Bentonite;
 - g. Organic Binder; and
 - h. Soda ash.
- 9. From the date of start-up to present, provide the process weight rates in tons per hour for each month, as required by Title V Permit Number T181-32081-00054, Conditions D.1.2 and D.2.2.
 - a. Iron ore concentrate transfer and storage area, EU001b;
 - b. Limestone unloading and storage, EU002a;
 - c. Dolomite unloading and storage, EU003a;
 - d. Coke breeze unloading, EU004a; and
 - e. Limestone and dolomite grinding mill bin area, EU025a.
- 10. From the date of start-up to present, provide all analyses for each shipment of coke breeze and iron concentrate received by the facility. The analyses must include, among other things, the supplier's name, the sulfur concentration, the fluoride concentration, and the weight of each shipment. Provide the quarterly weighted average fluoride concentration in the iron ore content. All analysis should be provided in the format required by Title V Permit Number T181-32081-00054, Conditions D.1.6 and D.3.13.
- 11. Provide an analysis of sulfur dioxide emissions from the Furnace Hood Exhaust and Furnace Windbox Exhaust on a mass basis. Include sulfur content assumptions and supporting documentation for input materials.

12. Provide copies of operation and maintenance manuals and preventative maintenance plans for all emission units and associated air pollution control devices. For each baghouse operated as an associated air pollution control device, provide the minimum and maximum differential pressure when the baghouse is operating. Also include copies of the inspections required by Title V Permit Number T181-32081-00054, Conditions D.2.11, D.4.8, and D.5.6.
13. Provide copies of all documents, notes, reports, and correspondences related to the proper operation of the facility's baghouses. The response should include any recommendations and/or evaluations made by third-party auditors and equipment manufacturers of the air pollution control equipment at the facility. Each document should identify the dates the recommendations were given to the facility. This should also include copies of the permit required, semi-annual baghouse inspections.
14. Provide a list of all maintenance activities and/or equipment upgrades or modifications that took place on all permitted air emission control devices performed during the October 2015 shutdown.
15. From the date of start-up to present, provide the following for all bin vents at the facility:
 - a. copies of the manufacturers' operating specifications for each specific vent;
 - b. copies of all semi-annual bin vent inspections;
 - c. identification or list of defective filters that were replaced;
 - d. malfunction events and corresponding shut-down time periods; and
 - e. a list of corresponding corrective actions for each shut-down listed in 15.d.
16. From the time of start-up to present, provide the following information for emission unit CE015, the gas suspension absorber (GSA):
 - a. Daily minimum air flow rate (dscfm) through the reactor of the GSA as determined by the static pressure of the venturi;
 - b. Periods of time when the air flow rate was below the minimum permitted requirement and a list of the corresponding corrective actions; and
 - c. Type (i.e., lime or lime slurry) and rate (i.e., pounds per hour) of injectant used.
17. From the date of start-up to present, provide the final pellet production in tons for each month.
18. Provide a copy of the most recent Fugitive Dust Control Plan.
19. Provide a list of all capital expenditure requests and all associated justifications for any and all projects and/or upgrades to the facility since August 1, 2014, to present. For each capital expenditure, include a brief description of the project, the purpose of the project, the date completed or the projected date of completion, the work order number, and the total cost expended (or, where the project is not completed, the estimated total cost expenditure).

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Terry Nanti
Magnetation LLC
64 East 100 North
Reynolds, Indiana 47980

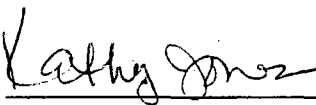
I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Terry Nanti
Magnetation LLC Headquarters
102 NE 3rd Street, Suite 120
Grand Rapids, Minnesota 55744

Janusz Johnson
Section Chief, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Rebecca Hayes
Compliance and Enforcement Manager, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

On the 16th day of December 2015.


for Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9581 4854